

Terry E. Welch (5819) ([twelch@parrbrown.com](mailto:twelch@parrbrown.com))  
Bentley J. Tolk (6665) ([btolk@parrbrown.com](mailto:btolk@parrbrown.com))  
Rodger M. Burge (8582) ([rburge@parrbrown.com](mailto:rburge@parrbrown.com))

**PARR BROWN GEE & LOVELESS**

101 South 200 East, Suite 700  
Salt Lake City, Utah 84111  
Telephone: (801) 532-7840  
Facsimile: (801) 532-7750

*Attorneys for Defendants Kevin Long and Millcreek Commercial, LLC*

---

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

---

PATTI KLAIR, ROBERT MYERS,  
ROBERT BARNES, ERIC CARNRITE,  
ELIZABETH HILL-D'ALESSANDRO,  
ROBERT TANNEHILL, DITAS  
TANNEHILL, JOSE REMENTERIA,  
TEENA REMENTERIA, CHARLES  
BRAUER, LAURA BRAUER, KAREN  
MARION, KATHERINE MADERA, CARL  
MCQUEARY, LYNN MCQUEARY,  
DONALD PATTERSON, KURTIS TRENT  
MANNING, TONY SCHAKER, PATRICK  
WHITE, HILDEGARD WHITE, QUEST  
REALTY TRUST, SECURE STORAGE  
LLC, KURTIS TRENT MANNING LIVING  
TRUST,

Plaintiffs,

vs.

KEVIN LONG, MILLCREEK  
COMMERCIAL, LLC, COLLIERS  
INTERNATIONAL, ANDREW BELL,  
TREVOR WEBER, SPENCER TAYLOR,  
BLAKE MCDOUGAL, SCOTT  
RUTHERFORD, EQUITY SUMMIT  
GROUP, ELEVATED 1031,

Defendants.

---

**REQUEST TO SUBMIT FOR DECISION**

**(Hearing Requested)**

Case No. 2:23-cv-00407-AMA-CMR

District Judge Ann Marie McIff Allen

Magistrate Judge Cecilia M. Romero

---

Pursuant to DUCivR 7-3, Defendants Kevin Long (“Long”) and Millcreek Commercial, LLC (“Millcreek”), through their counsel of record, hereby respectfully request that Long and Millcreek’s Joint Motion to Consolidate Related Cases (Hearing Requested) (the “Motion”) be submitted for decision. The Motion and related filings were filed as follows:

- The Motion was filed on April 29, 2024;
- Chris Wilson’s Memorandum in Opposition to Defendants’ Joint Motion to Consolidate Related Cases (Hearing Requested) was filed on May 13, 2024;
- Kate Grant and Karmann Kasten, LLC’s Memorandum in Opposition to Defendants’ Joint Motion to Consolidate Related Cases (Hearing Requested) was filed on May 13, 2024;
- Plaintiffs’ Opposition to Defendants’ Joint Motion to Consolidate (Hearing Requested) was filed on May 13, 2024; and
- Long and Millcreek’s Reply in Support of Joint Motion to Consolidate Related Cases (Hearing Requested) was filed on June 4, 2024.

A hearing on the Motion has been requested.

DATED this 13<sup>th</sup> day of June, 2024.

**PARR BROWN GEE & LOVELESS, P.C.**

/s/ Bentley J. Tolk

Terry E. Welch  
Rodger M. Burge  
Bentley J. Tolk

*Attorneys for Defendants Kevin Long and  
Millcreek Commercial, LLC*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 13<sup>th</sup> day of June, 2024, a true and correct copy of the foregoing **REQUEST TO SUBMIT FOR DECISION (HEARING REQUESTED)** was filed through the Court's ECF system, providing notice to all counsel of record.

/s/ Bentley J. Tolk